

REMARKS

Claims 1-28 remain pending in the application. Claims 1, 7, 13, 14, 19, 24, 27, and 28 have been amended to recite that the address pattern is optically detected by the electronic reading device. A marked up copy of all claim amendments is attached hereto as Appendix A. Applicants respectfully request reconsideration of the application in view of the following remarks.

The present invention relates to a system and method for retrieving position-related information by using a map and an electronic reading device. In accordance with a preferred embodiment of the present invention, a map is printed on paper that includes a specific address pattern, see page 47, lines 2-7. The address pattern comprises, for example, a pattern of dots on the paper, see page 10, line 9 to page 11, line 14. When a user points to a particular location on the map (e.g. a street intersection) with the electronic reading device, the electronic reading device optically reads, or detects, a particular portion of the address pattern. The address pattern included on the map that is detected by the electronic reading device corresponds to the specific location selected by the user. After selecting the specific location, the user can receive, for example, directions to that location, stores located near the location, or other position-related information, see page 45, line 18 through page 46, line 5.

The Conroy et al reference discloses a system and method for using a stylus on a flexible layer. A processor triangulates the position pressed by the stylus by using two other known points, see col. 7, lines 44-48. The triangulated position is used to retrieve information from a particular memory address, see col. 9, lines 20-24.

Regarding the §103 Rejection

Claims 1-26 and 28 were rejected under 35 U.S.C. §103(a) as being unpatentable over Conroy et al (U.S. 5,686,705) in view of De Lorme et al (U.S. 6,321,158).

With respect to claim 1, this claim recites a map including an address pattern. An electronic reading device optically detects (e.g., scans) a portion of the address pattern and a server identifies a geographical location that corresponds to the detected portion of the address pattern. In contrast, the Conroy reference teaches a graphical representation such as a map on a “skin” that may be slipped over a conductive layer. A stylus *presses* a particular point on the conductive layer. The stylus does not optically read any information or address pattern from the conductive layer or the skin including the map. Instead, a microprocessor triangulates the position pressed by the stylus by using two other known points. The triangulation used in Conroy is in direct contradiction with the electronic reading device of the present invention. The present invention has no need to use triangulation to determine the position selected by a user. The position is known through the address pattern that is optically detected by the electronic reading device of the present invention. Accordingly, the Conroy reference does not teach or suggest an electronic reading device including a sensor for optically detecting a portion of an address pattern. Furthermore, the De Lorme reference does not teach or suggest the reading device or address pattern of the present invention. As such, Applicants respectfully submit that claim 1 is not rendered obvious by the combination of the Conroy and De Lorme references, and request that the §103 rejection be withdrawn.

With respect to claims 2-13, these claims are directly or indirectly dependent from claim 1 and should therefore not be rendered obvious for at least the same reasons as stated above. As such, Applicants respectfully request that the §103 rejection be withdrawn.

With respect to claim 14, this claim recites optically detecting a selected position on an address pattern with an electronic reading device. The Conroy reference fails to teach or suggest an address pattern. Moreover, as noted above with respect to claim 1, the Conroy reference teaches a stylus that presses a particular point on a conductive layer. The Conroy stylus itself is incapable of optically reading an address pattern. The Conroy reference teaches that the stylus may also be the user's finger, see abstract. Furthermore, the Conroy reference uses triangulation to determine the point selected by the user. Accordingly, the Conroy reference does not teach or suggest optically detecting a selected position on an address pattern with an electronic reading device. The addition of the De Lorme reference does not remedy the deficiencies of the Conroy reference in that the De Lorme reference does not teach or suggest an address pattern or the use of an electronic reading device to optically detect a position on an address pattern. As such, Applicants respectfully submit that claim 14 is not rendered obvious by the combination of the Conroy and De Lorme references, and request that the §103 rejection be withdrawn.

With respect to claims 15-26, these claims are either directly or indirectly dependent from claim 14 and should therefore not be rendered obvious for at least the same reasons as stated above. As such, Applicants respectfully request that the §103 rejection be withdrawn.

Claim 28 recites a server operable to receive information relating to an optically detected portion of an address pattern via a communication network, wherein the portion of the address pattern is optically detected by a reading sensor on an electronic reading device. In contrast, the Conroy reference, as noted above, fails to disclose or suggest an address pattern. Furthermore, the Conroy reference teaches a stylus that presses a particular point on a conductive layer. The Conroy stylus itself is incapable of optically detecting an address pattern. Instead, the Conroy reference uses triangulation to determine the point selected by the user. Thus, the Conroy reference does not teach or suggest optically detecting a portion of an address pattern by a reading sensor on an electronic reading device. The addition of the De Lorme reference does not remedy the deficiencies of the Conroy reference in that the De Lorme reference does not teach or suggest an electronic reading device or an address pattern, as claimed. As such, Applicants respectfully submit that claim 28 is not rendered obvious by the combination of the Conroy and De Lorme references, and request that the §103 rejection be withdrawn.

Regarding the §102 Rejection

Claim 27 was rejected under 35 U.S.C. §102(e) as being anticipated by De Lorme et al (U.S. 6,321,158).

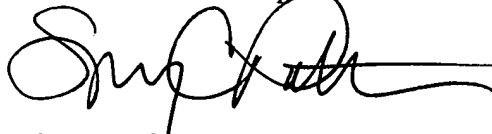
With respect to claim 27, this claim recites a method for producing a map for use with an electronic reading device including the steps of assigning each position of a selected, optically detectable address pattern to a corresponding geographical location and printing the map on a region of the selected, optically

detectable address pattern, such that each geographical location on the map is printed at the corresponding assigned position of the selected, optically detectable address pattern. The De Lorme reference, as noted above, does not teach the optically detectable address pattern of the present invention. Instead, the De Lorme reference uses the same type of screen (conductive layer) and stylus as taught in the Conroy reference. Therefore, the De Lorme reference does not teach or suggest the steps of the present invention. As such, Applicants respectfully submit that claim 27 is not anticipated or rendered obvious by the De Lorme reference and request that the §102 rejection be withdrawn.

In view of the foregoing, Applicant respectfully requests the thorough reconsideration of this application and earnestly solicits an early notice of allowance.

Respectfully submitted,

JENKENS & GILCHRIST,
A Professional Corporation

A handwritten signature in black ink, appearing to read 'Spencer C. Patterson', with a long horizontal flourish extending to the right.

Spencer C. Patterson
Reg. No. 43,849

1445 Ross Avenue, Suite 3200
Dallas, Texas 75202-2799
(214) 855-4177
(214) 855-4300 (fax)

APPENDIX A
MARKED UP CLAIM SET IN RESPONSE
TO OFFICE ACTION DATED DECEMBER 20, 2001

1. (Amended) A system for retrieving position-related information, comprising:

a map, including:

a representation of a particular geographical area; and

an address pattern, wherein each position on the address pattern can be identified from an associated unique portion of the address pattern, each position on the address pattern corresponding to a specific geographical location within the geographical area;

an electronic reading device including a reading sensor for optically detecting a portion of the address pattern; and

a server for identifying a specific geographical location corresponding to the detected portion of the address pattern.

7. (Amended) The system of claim 3, wherein the specific geographical location comprises a destination location, the electronic reading device further used to optically detect an additional portion of the address pattern corresponding to an origination location.

13. (Amended) The system of claim 1, wherein the electronic reading device optically detects a plurality of positions on the address pattern, said plurality of positions corresponding to a selected area, the server sending information relating to facilities within the selected area.

14. (Amended) A method for retrieving position-related information, comprising the steps of: optically detecting a selected position on an address pattern with an electronic reading device, wherein said position can be determined from a portion of the address pattern near the position; sending an indication of the selected position from the electronic reading device to a server; and identifying a geographical location corresponding to the selected position.

19. (Amended) The method of claim 17, further comprising the step of selecting the specific geographical location by optically detecting an additional position on the address pattern with the electronic reading device.

24. (Amended) The method of claim 14, wherein the step of optically detecting a selected position involves optically detecting a plurality of selected positions and the step of identifying a geographical location comprises identifying a geographical area corresponding to the plurality of selected positions, further comprising the step of identifying at least one feature of the identified geographical area.

27. (Amended) A method for producing a map for use with an electronic reading device, comprising the steps of:

assigning each position of a selected, optically detectable address pattern to a corresponding geographical location;

identifying a region of the selected, optically detectable address pattern that corresponds to a geographical area to be represented on a map; and

printing the map on the identified region of the selected, optically detectable address pattern, such that each geographical location on the map is printed at the corresponding assigned position of the selected, optically detectable address pattern.

28. (Amended) A system for retrieving position-related information, comprising:

a server connected to a communication network, said server operable to:

receive information relating to an optically detected portion of an address pattern via the communication network, wherein said portion of the address pattern is optically detected by a reading sensor on an electronic reading device, said address pattern included on a map having a representation of a particular geographic area; and

identify a specific geographical location corresponding to the detected portion of the address pattern.